

KAUFMAN | DOLOWICH

Adam A. Perlin, Esq.
aperlin@kaufmandolowich.com

Kaufman Dolowich LLP
135 Crossways Park Drive, Suite 201
Woodbury, NY 11797

Telephone: 516.681.1100

www.kaufmandolowich.com

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BY ECF and Email: JMM hearings@nyeb.uscourts.gov

The Honorable Jil Mazer-Marino
United States Bankruptcy Judge
Bankruptcy Court for the Eastern District of New York
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East – Suite 1595
Brooklyn, NY 11201

Re: *The Ideal Supply Company v. David Rusi*
Adversary Proceeding No.: 1-23-01087-jmm

Dear Judge Mazer-Marino,

The undersigned represents Plaintiff The Ideal Supply Company in the above-referenced matter.

The Court previously extended the fact discovery deadline to May 10, 2024. However, to accommodate Defendant Rusi's schedule, the parties completed the deposition of Defendant Rusi on May 14, 2024 and no further fact discovery remains. Whereas Plaintiff intends to submit a motion for summary judgment, the parties respectfully and jointly request that the Court enter the following briefing schedule:

Plaintiff will submit its summary judgment motion on or before June 28, 2024; Defendant will submit his opposition, if any, to that motion on or before July 29, 2024; Plaintiff will submit its reply, if any, on or before August 12, 2024.

The parties further jointly request that the Court adjourn the pre-trial conference currently scheduled for June 11, 2024 at 11:30 AM *sine die*.

Thank you in advance for Your Honor's consideration of this request.

Respectfully,

Adam A. Perlin

Cc: John Macron, Esq. (via email and ECF)